

# EXHIBIT Q

THE NEW SCHOOL

Brandon White

Document shared with you: "INVESTIGATIVE REPORT: [REDACTED] - White"

2 messages

Cassita Charles-Bowie (via Google Docs)

Fri, Apr 12, 2024 at 4:52 PM

Reply-To: Cassita Charles-Bowie

To:

Cc:

## Cassita Charles-Bowie shared a document



Cassita Charles-Bowie ([REDACTED]) has invited you to **view** the following document until Apr 15, 2:00 PM PDT:

Good afternoon,

Please find attached the investigative report which includes [REDACTED] formal complaint and Brandon White's cross formal complaint. You will have 72 hours to review the report and attachments. The review deadline is Monday, 4/15/24 at 5pm. Thank you.

Respectfully,  
Student Equity, Accessibility & Title IX

 INVESTIGATIVE REPORT: [REDACTED] - White

Open

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA  
You have received this email because [REDACTED] shared a document with you from Google Docs.

Google Workspace

**Brandon White**

Fri, Apr 12, 2024 at 6:51 PM

To:

[Quoted text hidden]



## **INVESTIGATIVE REPORT**

### **CONFIDENTIAL**

**DECEMBER 8, 2023**

This report addresses alleged violations of the University Policy on Harassment, Discrimination, Prohibited Relationships, Title IX and Non-Title IX Sexual Harassment and Misconduct of the New School. Cassita Charles-Bowie and Shannon Schmutz conducted the investigation into these allegations. This report will summarize all administrative steps taken and all relevant evidence obtained during the course of the investigation.

#### **Applicable Policies:**

##### **UNIVERSITY POLICY ON HARASSMENT, DISCRIMINATION, PROHIBITED RELATIONSHIPS, TITLE IX AND NON-TITLE IX SEXUAL HARASSMENT AND MISCONDUCT**

The University will not tolerate discrimination or harassment based on an individual's race, creed, color, national origin, sex, gender, gender identity or expression, age, mental or physical disability, ethnicity, sexual orientation, genetic predisposition or carrier status, religion, pregnancy, veteran status, marital or partnership status, caregiver status or any other basis protected by applicable local, state or federal laws. Nor does the University tolerate unprofessional or bullying behavior among members of the campus community.

#### **Standard of Evidence:**

To determine whether an individual has violated the University Policy on Harassment, Discrimination, Prohibited Relationships, Title IX and Non-Title IX Sexual Harassment and



Misconduct, the standard of evidence is a preponderance of the evidence, which is evidence that demonstrates whether it is more likely than not that the conduct occurred.

---

### **Involved Parties**

**Complainant/ Respondent:** [REDACTED], New School for Social Research, Graduate

**Respondent/ Complainant:** Brandon White, Parsons School of Design, Senior

---

### **Witness**

[REDACTED]: Schools of Public Engagement, Graduate

Michael Biondo, Director of Security Operations

---

**Procedural History:** On the afternoon of 12/4/23, during a demonstration at the University Center, [REDACTED], an organizer of the demonstration and a member of the New School chapter of Student for Justice in Palestine, alleged that Brandon White punched them during the demonstration and made homophobic and transphobic remarks to them. Brandon White denied punching [REDACTED] and making homophobic and transphobic remarks to [REDACTED] or anyone else. Also, the Senior Investigator, Cassita Charles-Bowie was summoned to jury duty from 1/16/24 to 2/16/24 and so there was a delay in the process. Brandon White has filed a cross formal complaint against [REDACTED] for the violation of Title VI, regarding the assumption made about his identity and the subsequent denial of access to university facilities directly infringed upon his rights.



██████████:

---

██████████ met with Student Equity, Accessibility & Title IX on 12/7/23. The following is their account of the incident between them and Brandon White, ("Brandon") on 12/4/23:

"At around 2pm, a white man in a yankees baseball cap attempted to break through the doors to get through to protestors, again despite the fact that another entrance was available. His goal was not to enter the building to study, but specifically to intimidate protestors and to enact violence upon us. I tried my hardest to keep the door closed as he called me and another student faggots. After he was able to yank the door open, he punched me in my face while calling me a fucking faggot. At this point me and another student pushed him back and then he called another organizer a tranny while attempting to punch her as well, missing the punch. After, he left the UC and I followed to get a picture of him, which I have attached. When he saw me taking pictures, he grabbed my phone violently from my hand and threw it to the sidewalk. Campus security officer Mike Biondo witnessed all of this and refused to help me, despite my request. I personally asked Mike Biondo to step in to intervene, and he crossed his arms and laughed at me. Another student was able to get a clearer picture of him. By posting the photo on my instagram story, I was able to find out his identity through a mutual New School student. On instagram, his name is listed as Brandon White. I attached photos from his instagram as well where he is seen wearing the same black yankees hat as in the UC photos".

Despite repeated attempts to invite ██████████ to respond to the allegations in Brandon's formal complaint, they have been unresponsive. ██████████ has also been informed as their participation is not mandatory, the process can and will proceed in their absence.

██████████

---

The following is a statement from another organizer of the demonstration on 12/4/23 and a member of the Students for Justice in Palestine:

"I witnessed Brandon White and several other people he was with punch a queer person right in front of me at the UC inner doors soon after calling said queer person a "faggot". When he grabbed this queer person's phone and threw it on the sidewalk and I realized no security would intervene, I ran out to protect them from Brandon. Brandon subsequently attempted to punch me, called me a "faggot" and muttered something with the word "tranny" under his breath as he walked away across 5th Ave. I am a 125 lb transsexual woman, for the record. Brandon was wearing a black and white Yankees cap and a white coat at the time in which he engaged us with violence."



**Brandon White:**

---

Brandon White, ("Brandon"), met with Student Equity, Accessibility & Title IX on 12/20/23. The following statement is Brandon's response to [REDACTED] formal complaint:

"On December 4th, I approached the university center at approximately 1:58 PM. At that I observed a group of students equipped with a microphone. They were expressing to students to not enter and leave, demonstrating support for Palestine. Initially, I was uncertain about the situation, so I maintained a distance.

As I attempted to enter the building, Keep in mind that I was holding my laptop in my left hand the whole time. I observed that the protest was impeding student access to the university, which was concerning to me. There were no other entrances open at the time. All I wanted to do was attend my class that started at 2:10 which would prepare me for a very important finals exam. As I entered the first set of doors I am now in the vestibule and [REDACTED] appeared to be actively obstructing access by holding the door shut. In response, I pulled the door open and attempted to pass through. However [REDACTED] blocked my path, and I was subsequently pushed back into the vestibule, causing me to feel intimidated with fear.

This action, combined with the mounting chaos and loud voices, instilled in me a profound fear for my personal safety. It seemed that every path to fulfill my academic responsibility was being physically and deliberately barred by the protesters. In a state of heightened fear, amidst the intensifying situation, Still in the vestibule I stated "let me the fuck in" "You have no right to block an entrance" "fucking bullshit" then desperately tried to open another door to the left. That's when [REDACTED] approached me in a confrontational manner, phone in hand, my fear escalated. As he brought his phone uncomfortably close to my face, in a moment of sheer panic and fearing for my immediate safety, I instinctively pushed the phone away. I want to emphasize that this was a reflexive action driven by fear, not aggression.

After this terrifying encounter, I found myself on the street, still shaking with fear. The realization that my simple attempt to attend a class could lead to such a threatening situation is deeply disturbing. As I crossed the street, another student pursued me stating that they would find out who I am and will find me.



### **Social Media and Public Statements:**

I am also aware of the statements made by [REDACTED] and [REDACTED] in The New School Press, as well as the posts on social media by [REDACTED], which include direct allegations against me and calls for action that impact my reputation and academic standing. These public narratives in the new school press differ significantly from the original complaint and my recollection of the events. The social media campaign has escalated the situation which has

- led to direct allegations against me, significantly affecting my reputation and academic standing.
- There have been calls for action across social media, resulting in outreach to organizations I have collaborated with and personal contacts.
- My relationships, both professional and personal, have been unjustly affected, creating a sense of vulnerability and distress.

### **[Concerns Over Violation of Demonstration Policies]**

The actions of the protestors, including blocking access to the UC, raise serious concerns regarding the adherence to The New School Demonstration policies. Such actions not only impeded my academic responsibilities but also posed safety and accessibility issues for other students and faculty members. This situation highlights a critical need for respectful and policy-abiding demonstrations on campus.

### **Michael Biondo**

---

Director of Security Operations, Michael Biondo met with Student Equity, Accessibility & Title IX on 3/14/24 as a potential eye-witness to the demonstration of 12/4/23. Officer Biondo stated that he did not witness any students punch, spit on or engage in any physical confrontations of any kind during the demonstration of 12/4/23 but that the protestors were saying things to the people trying to enter the building. Officer Biondo also stated that the protesters initially blocked the doors of the main entrance, as well as the turnstiles, to the University Center. He indicated that campus safety then opened an alternate entrance on 13th street and that [REDACTED] had protestors block that entrance as well. Officer Biondo also shared that the Kerrey street entrance was also opened by campus safety officers and that [REDACTED] had those doors blocked also.

Officer Biondo recounted a conversation with [REDACTED] wherein [REDACTED] asked, "aren't you going to do anything?" to which Officer Biondo explained that campus safety could not physically remove anyone, safety, [REDACTED] responded, "you're just a piece of shit". Officer Biondo





indicated that this was the end of the conversation and that [REDACTED] did not ask him to perform any specific action. Officer Biondo also expressed that none of the campus safety officers reported witnessing any physical or violent interactions between any of the students.

**DOCUMENTARY EVIDENCE:**

1. Instagram posts provided by Brandon White and submitted as Exhibit A.
2. Videos of the demonstration of 12/4/23 provided by Campus Safety and submitted as Exhibit B.

\*None of the surveillance footage shows any interactions between [REDACTED] and Brandon White. The issue is whether it is more likely than not that Brandon committed the acts that [REDACTED] has alleged against him.

**Conclusion:**

---

The case is referred to Student Conduct and Community Standards.